

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al.,

Plaintiffs,

vs.

NO. 5:21-cv-844-XR

GREGORY W. ABBOTT, et al.,

Defendants.

OCA-GREATER HOUSTON, et al.,

Plaintiffs,

vs.

NO. 1:21-cv-780-XR

JOHN SCOTT, et al.,

Defendants.

HOUSTON JUSTICE, et al.

Plaintiffs,

vs.

NO. 5:21-cv-848-XR

GREGORY WAYNE ABBOTT, et al.

Defendants.

LULAC TEXAS, et al.

Plaintiffs,

vs.

NO. 1:21-cv-786-XR

JOHN SCOTT, et al.

Defendants.

MI FAMILIA VOTA, et al.

Plaintiffs,

vs.

NO. 5:21-cv-0920-XR

GREG ABBOTT, et al.

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NO. 5:21-cv-1085-XR

THE STATE OF TEXAS, et al.

Defendants.

MI FAMILIA VOTA PLAINTIFFS' OBJECTIONS TO STATE DEFENDANTS' PRETRIAL DISCLOSURES

Plaintiffs Mi Familia Vota, Marla Lopez, Marlon Lopez, and Paul Rutledge (“MFV Plaintiffs”) respectfully submit the following objections to the State Defendants’ Pretrial Disclosures. The MFV Plaintiffs also join in any additional objections made by other Plaintiffs that are not included in the MFV Plaintiffs’ objections.

EXHIBITS

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
1	Signed and executed copy Senate Bill 1. https://webservices.sos.state.tx.us/legbills/files/C287/SB1.pdf .	No Objection
2	Expert Witness Report, Prof. Mark Hoekstra, Response to Prof. Eitan Hersh’s February 10, 2023, Second Supplemental Report. (Served on Mar. 3, 2023)	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
3	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Eitan Hersh's February 28, 2022, Initial Report.</i> (Served on Mar. 29, 2022).	No Objection
4	Notice of Correction to March 29, 2022, Expert Report of Prof. Mark Hoekstra, Ph.D., Written in Response to the February 28, 2022, Report by Prof. Eitan Hersh. (Served on Apr. 25, 2023).	No Objection
5	Expert Witness Report, Prof. Mark Hoekstra, Response to Prof. Christian Grose's February 10, 2023, Supplemental Report. (Served on Mar. 3, 2023)	No Objection
6	Expert Witness Report, Prof. Mark Hoekstra, Response to Prof. Christian Grose's February 28, 2022, Initial Report. (Served on Mar. 29, 2022).	No Objection
7	Notice of Correction to March 29, 2022, Expert Report of Prof. Mark Hoekstra, Written in Response to the February 28, 2022, Report by Prof. Christian Grose. (Served on Apr. 25, 2023).	No Objection
8	Expert Witness Report, Prof. Mark Hoekstra, Response to Prof. Eric McDaniel's February 10, 2023, Second Supplemental Report. (Served on Mar. 3, 2023).	No Objection
9	Expert Witness Report, Prof. Mark Hoekstra, Response to Prof. Eric McDaniel's February 28, 2022, Initial Report. (Served on Mar. 29, 2022).	No Objection
10	Expert Witness Report, Prof. Mark Hoekstra, Response to Prof. Kenneth R. Mayer's March 6, 2023, Supplemental Report. (Served on Apr. 5, 2023).	No Objection
11	Notice of Correction to April 5, 2023, Expert Report of Prof. Mark Hoekstra, PhD, Written in Response to the March 6, 2023, Report by Prof. Kenneth Mayer. (Served on Apr. 25, 2023).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
12	Expert Witness Report, Dr. Stephen C. Graves. (Served on Mar. 29, 2022).	No Objection
13	Election Advisory No. 2021-18, Re: Revised: March 1, 2022, Primary Election and May 24, 2022, Primary Runoff Election Law Calendar, dated November 12, 2021. (STATE097860-908).	No Objection
14	Election Advisory No. 2021-21, Re: Legislative Summary – Second and Third Special Sessions, dated November 19, 2021. (STATE001483-502).	No Objection
15	Election Advisory No. 2021-23, Re: May 7, 2022, Election Law Calendar, dated December 10, 2021. (STATE097909-48).	No Objection
16	Election Advisory No. 2022-07, Re: NEW LAW: Changes to Early Voting by Personal Appearance – House Bill 2025, House Bill 3107, and Senate Bill 1, dated January 21, 2022. (STATE001577-93)	No Objection
17	Election Advisory No. 2022-08, Re: NEW LAW: Senate Bill 1 – Opportunity to Correct Defects on Application for a Ballot by Mail and Carrier Envelope, dated November 19, 2021. (STATE034294-321)	No Objection
18	Election Advisory No. 2022-09, NEW LAW: Changes to Poll Watcher Requirements Under House Bill 3107 and Senate Bill 1, dated February 4, 2022. (STATE060559)	No Objection
19	Election Advisory No. 2022-12, Re: Additional Procedures Regarding Correction of Defects on Application for Ballot by Mail or Carrier Envelope, dated February 11, 2022. (STATE001469-73).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
20	Election Advisory No. 2022-18, Re: Additional Ballot by Mail Procedures for May Uniform Election and Primary Runoff Election, dated April 26, 2022. (STATE087955-58)	No Objection
21	Election Advisory No. 2022-25, Re: November 8, 2022, Election Law Calendar, dated June 20, 2022, dated June 20, 2022. (STATE122992-3039)	No Objection
22	Spreadsheet created by Secretary of State in response to media inquiries, listing mail- ballot rejection rates for 2022 elections. (STATE115581-616).	Foundation FRE 402 FRE 802
23	Final Report on Audit of 2020 General Election in Texas. (STATE115222-580).	FRE 402 FRE 802
24	Executive Summary to Audit 2020 General Election in Texas (STATE115212-221).	FRE 402 FRE 802
25	Harris County Post Election Assessment of the November 8, 2022, General Election. (STATE170230-83).	No Objection
26	Handbook for Election Judges and Clerks, Qualifying Voters on Election Day 2022, Secretary of State, revised July 2022. (STATE110976-1056).	FRE 802
27	Handbook for Election Judges and Clerks, Early Voting Ballot Board & Signature Verification Committee, Secretary of State, revised July 2022. (Exhibit 17 – February 28, 2023, Dep. of Jacquelyn Callanen).	No Objection
28	Poll Watcher's Guide, Secretary of State, revised January 2022. (STATE106313-337).	No Objection
29	Draft of Poll Watcher Online Training, Secretary of State, January 20, 2022 (STATE035175-90).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
30	Texas Voter Registration Application (Spanish) (STATE046251–52).	No Objection
31	Texas Voter Registration Application (English) (STATE046253–54).	No Objection
32	Federal Post Card Application (Exhibit 3 – July 29, 2022, Dep. of Scott Wiedmann).	No Objection
33	Federal Write-In Absentee Ballot (Exhibit 4 – July 29, 2022, Dep. of Scott Wiedmann).	No Objection
34	Form 4-20, Certificate of Appointment of Poll Watcher by a Candidate, January 2022. (STATE060813–14).	No Objection
35	Form 4-21, Certificate of Appointment of Poll Watcher by Political Party, January 2022. (STATE060815–16).	No Objection
36	Form 4-22, Certificate of Appointment of Poll Watcher for Propositions or Measures, January 2022 (STATE060817–16).	No Objection
37	Form 4-23, Certificate of Appointment of Poll Watcher by Registered Voters on Behalf of a Write-In Candidate, January 2022 (STATE060819–20).	No Objection
38	Form 5-21, Ballot Envelope (For Secrecy), January 2022. (STATE061390–91).	No Objection
39	Form 6-2, Notice of Rejected Application for Ballot by Mail, January 2022. (STATE031641–42).	No Objection
40	Form 6-3, Notice of Rejected Application for Ballot by Mail - Missing or Incorrect Personal Identification Numbers, January 2022. (STATE031643–44).	No Objection
41	Form 6-4, Notice of Rejected Application for Ballot by Mail - Required Personal Identification Number is Not Associated with Your Voter Record, January 2022. (STATE074329–30).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
42	Form 6-6, Request to Cancel Application for Ballot by Mail – Early Voting Clerk's Form, January 2022. (STATE091410–11).	No Objection
43	Form 6-11, EVC Notice of Carrier Defect Mailed with Corrective Action Form (Spanish), April 2022. (STATE123304–06).	No Objection
44	Form 6-11, EVC Notice of Carrier Defect Mailed with Corrective Action Form (English), April 2022. (STATE123307–09).	No Objection
45	Form 6-12, EVC Notice of Carrier Defect Phone with Corrective Action Form (Spanish), April 2022. (STATE123310–12).	No Objection
46	Form 6-12, EVC Notice of Carrier Defect Phone with Corrective Action Form (English), April 2022. (STATE123313–15).	No Objection
47	Form 6-13, Notice of Surrendered Ballot by Mail, January 2022. (STATE034285).	No Objection
48	Form 6-14, Corrective Action Form for Defective Carrier Envelope, January 2022. (STATE034286).	No Objection
49	Form 6-15, Carrier Envelope for Early Voting Ballot (regular ABBM), July 2022. (STATE138768–70).	No Objection
50	Form 6-17, Information about Returning Your Carrier Envelope, January 2022. (STATE074293–94).	No Objection
51	Form 6-35, Notes for Carrier Envelope (FPCA), January 2022. (STATE01634).	No Objection
52	Form 6-36, Information about Returning Your Voted Mail Ballot (FPCA Insert), January 2022. (STATE031652–53).	No Objection
53	Form 6-37, Official Election Signature Sheet for an FPCA Voter, December 2021 (English/Spanish). (STATE001643–44).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
54	Form 7-33 (AW7-7b), Notice of Voting Order Priority, January 2022. (STATE033209)	No Objection
55	Form 7-58, Oath of Assistance and Interpreter, July 2022. (STATE138771-72).	No Objection
56	Form 7-59, Information of Person that Provided Transportation to Seven or More Voters for Curbside Voting, October 2022. (Exhibit 9 – March 21, 2023, Dep. Of Lauren Smith).	No Objection
57	Form 8-15, Notice of Rejected Ballot, January 2022. (STATE152170).	No Objection
58	Form 8-20, Roster of Voters with Defective Carrier Envelopes – Returned to the Voter by Mail, January 2022. (STATE034287).	No Objection
59	Form 8-21, Roster of ABM Voters with Defective Carrier Envelopes – Notified by Phone or Email, January 2022. (STATE034288).	No Objection
60	Form 8-22, Roster of FPCA Voters with Defective Carrier Envelopes – Notified by Phone or Email, January 2022. (STATE034289).	No Objection
61	Form 8-23, Notice of Carrier Defect – Carrier Envelope Returned to the Voter by Mail, January 2022. (STATE034290).	No Objection
62	Form 8-24, Notice of Carrier Defect – Vote Notified of Carrier Envelope Defect by Phone or Email, January 2022. (STATE034292).	No Objection
63	Instructions for Form 9-12, Preliminary Election Reconciliation - Unofficial Totals (Election Day), February 2022. (STATE019487-488).	No Objection
64	Form 9-12, Preliminary Election Reconciliation - Unofficial Totals (Election Day), February 2022. (STATE019489).	No Objection
65	Form 9-13, Election Reconciliation Form – Official Results (Canvass Form) February 2022. (STATE019490).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
66	Instructions for Form 9-13, Election Reconciliation Form - Official Results (Canvass Form), February 2022. (STATE019491-92).	No Objection
67	January 18, 2022, Email from Election Security Trainer Alexa Buxkemper to Legal Director Christina Adkins, Re: How many forms (STATE033331-32).	FRE 402 FRE 802
68	Carrier Envelope Insert utilized by Denton County to remind voters of ID number requirement. (STATE154278).	No Objection
69	Carrier Envelope Insert utilized by Travis County to remind voters of ID number requirement. (064.134768-69).	No Objection
70	Carrier Envelope Insert utilized by Travis County to remind voters of ID number requirement. (064.134775-76).	No Objection
71	ABBM Insert utilized by Travis County to remind voters of ID number requirement. (064.134766-67).	No Objection
72	ABBM Insert with Numbers utilized by Travis County to remind voters of ID number requirement. (064.134773-74).	No Objection
73	Carrier Envelope Insert utilized by Harris County in 2022 Primaries to remind voters of ID number requirement (English/ Spanish). (TATUM 005333-34).	No Objection
74	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Chinese/English). (TATUM 005335-36).	No Objection
75	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Spanish/English). (TATUM 005337-38).	No Objection
76	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Vietnamese/English). (TATUM 005337-38).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
77	Carrier Envelope Insert utilized by Bexar County in the May 7, 2022, Local Election and May 24, 2022, Primary Runoff to remind voters of ID number requirement. (Exhibit C – April 20, 2022, Dep. of Jacquelyn Callanan).	No Objection
78	Carrier Envelope Insert utilized by Bexar County in the November 8, 2022, General Election to remind voters of ID number requirement. (Exhibit 13 – February 28, 2023, Dep. of Jacquelyn Callanan).	No Objection
79	Carrier Envelope Insert utilized by Hays County to remind voters of ID number requirement. (STATE139500–01).	No Objection
80	Carrier Envelope Insert utilized by Kleberg County to remind voters of ID number requirement. (STATE142722).	No Objection
81	ABBM Insert utilized by Kleberg County to remind voters of ID number requirement. (STATE140753).	No Objection
82	CONFIDENTIAL Election Fraud Violations Chart, Office of the Attorney General, updated April 20, 2022. (STATE112177–93).	FRE 402 FRE 802 Foundation
83	CONFIDENTIAL Instances of Suspected Illegal Voting Since March 1, 2018 – Cases Opened, Office of the Attorney General. (STATE112155–57).	FRE 402 FRE 802 Foundation
84	CONFIDENTIAL Case Tracking Spreadsheet, Election Integrity Unit, Office of the Attorney General. (STATE112158–59).	FRE 402 FRE 802 Foundation
85	2020 Complaint Log, Secretary of State (STATE078234).	FRE 402 FRE 802 Foundation
86	2016–2019 Complaint Log, Secretary of State (STATE078237).	FRE 402 FRE 802 Foundation
87	Election Fraud Complaints Referred for Investigation: SOS Referrals, updated May 10, 2022. (STATE107717–32).	FRE 402 FRE 802 Foundation

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
88	March 11, 2021, Email from Director of Government Relations Ryan Fisher at the Office of Attorney General to Jessica Hart; Re: OAG Election Fraud Section. (STATE090960).	FRE 402 FRE 802
89	Power Point Presentation, <i>Election Integrity</i> . (STATE054622-77).	FRE 402 FRE 802 Foundation
90	Indictment, <i>Texas v. Ward</i> , Cause No. 50947-B (STATE098012-14).	FRE 402 FRE 802
91	Indictment, <i>Texas v. Jackson</i> , Cause No. 50949-B (STATE097980-98000).	FRE 402 FRE 802
92	Indictment, <i>Texas v. Burns</i> , Cause No. 50951-B (STATE098008-11).	FRE 402 FRE 802
93	Indictment, <i>Texas v. Brown</i> , Cause No. 50953-B (STATE098001-07).	FRE 402 FRE 802
94	Indictment, <i>Texas v. Molina</i> , W-19-0134-J22. (STATE098413-18).	FRE 402 FRE 802
95	Indictment, <i>United States v. Orellana</i> , Case No. 9:18-cr-00020 (STATE098510-15).	FRE 402 FRE 802
96	Judgment in a Criminal Case, <i>United States v. Orellana</i> , Case No. 9:18-cr-00020 (STATE098516-22).	FRE 402 FRE 802
97	Plea Agreement, <i>United States v. Orellana</i> , Case No. 9:18-cr-00020 (STATE098523-32).	FRE 402 FRE 802
98	Warrant of Arrest, <i>Texas v. Molina</i> , W-19-0134-J22. (STATE098537-44).	FRE 402 FRE 802
99	Agreement, OAG Prosecution Diversion Program, related to illegal voting, signed March 8, 2022. (STATE087320).	FRE 402 FRE 802
100	Agreement, OAG Prosecution Diversion Program, related to unlawful assistance, signed June 6, 2018. (STATE087340).	FRE 402 FRE 802
101	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed October 28, 2021. (STATE087342).	FRE 402 FRE 802

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
102	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed August 14, 2020. (STATE087345).	FRE 402 FRE 802
103	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed August 19, 2020. (STATE087360).	FRE 402 FRE 802
104	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed June 5, 2018. (STATE087365).	FRE 402 FRE 802
105	Agreement, OAG Prosecution Diversion Program, related to unlawful assistance, signed June 15, 2018. (STATE087341).	FRE 402 FRE 802
106	Agreement, OAG Prosecution Diversion Program, related to failure to sign application as a witness, signed May 19, 2021. (STATE087373).	FRE 402 FRE 802
107	Agreement, OAG Prosecution Diversion Program, related to violations of Tex. Elec. Code §§ 64.012 and 276.013, signed August 5, 2019. (STATE087375).	FRE 402 FRE 802
108	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087376).	FRE 402 FRE 802
109	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 25, 2018. (STATE087377)	FRE 402 FRE 802
110	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 25, 2018. (STATE087380).	FRE 402 FRE 802
111	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on application for ballot by mail, signed July 25, 2018. (STATE087381).	FRE 402 FRE 802

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
112	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on application for ballot by mail, signed July 25, 2018. (STATE087381).	FRE 402 FRE 802
113	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed September 17, 2018. (STATE087386).	FRE 402 FRE 802
114	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087391).	FRE 402 FRE 802
115	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087392).	FRE 402 FRE 802
116	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087393).	FRE 402 FRE 802
117	Final Judgment, <i>Rangle v. Rodriguez</i> , NO. 2022CVK001669D1 (49th Dist. Ct., Webb County, Feb. 2, 2023) (STATE184628-37).	FRE 402 FRE 802
118	United States' Responses to Texas's First Set of RFPs – Privilege Log (Exhibit 10 – May 9, 2022, Dep. of Remi Garza).	FRE 402
119	November 4, 2013, Press Release from FBI San Antonio Field Office, Re: Former Cameron County Woman Convicted of Voter Fraud. (STATE107789).	FRE 402 FRE 802
120	June 5, 2014, Press Release from Department of Justice U.S. Attorney's Office Southern District of Texas, Re: Campaign Worker Pleads Guilty To Buying Votes In Donna School Board Election. (STATE107844-45)	FRE 402 FRE 802

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
121	June 19, 2014, Press Release from Department of Justice, Re: Campaign Manager Charged with Buying Votes in a Donna, Texas, School Board Election. (STATE097645-46)	FRE 402 FRE 802
122	December 1, 2014, Press Release from FBI San Antonio Field Office, Re: Campaign Manager Pleads Guilty to Conspiracy to Buy Votes in a Donna, Texas School Board Election. (STATE107785)	FRE 402 FRE 802
123	House Journal, Eightieth Legislature, Regular Session, Sixtieth Day – Monday April 23, 2007. (STATE098214-75).	FRE 402 FRE 802
124	Transcript of Texas Senate Committee on State Affairs, March 18, 2019, Hearing, Re: Senate Bill 9. (STATE098545-658).	FRE 402 FRE 802
125	December 3, 2018, Letter from Senator Judith Zaffirini to Senator Bryan Hughes regarding Senate Select Committee on Election Security. (STATE108349-50).	FRE 402 FRE 802
126	<i>Chuck DeVore, The Role of Voter List Maintenance and Voter Identification in Election Integrity</i> , Texas Public Policy Foundation, March 2021. (TXLEG_0001066).	Misidentified; all objections reserved
127	July 22, 2020, Letter from Harris County Clerk Chris Hollins to Governor Greg Abbott, Re: Extended Early Voting Days for November 2020 Election. (STATE098283).	FRE 402 FRE 802
128	Governor's Proclamation, dated July 27, 2020, suspending certain statutes concerning elections on November 3, 2020. (STATE098533-36).	No Objection
129	Governor Proclamation, dated October 1, 2020, suspending certain statutes concerning the November 3, 2020, elections. (Exhibit 3 – May 6, 2022, Dep. Of Chris Hollins).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
130	Complaint, ECF 1, Tex. League of United Latin Am. Citizens v. Abbott, 493 F. Supp. 3d 548, 567 (W.D. Tex. 2020), vacated sub nom. Tex. League of United Latin Am. Citizens v. Hughs, No. 20-50867, 2021 WL 1446828 (5th Cir. Feb. 22, 2021). (Exhibit 4 – May 6, 2022, Dep. of Chris Hollins).	No Objection
131	Justice Devine Dissent, In re Hotze, et al, No. 20-0751, 627 S.W.3d 652 (Tex. 2020). (Exhibit 13 – October 6, 2022, Dep. of Sen. Carol Alvarado).	No Objection
132	August 25, 2020, Tweet from Harris County Elections about unsolicited ABBMS. (Exhibit 6 – May 6, 2022, Dep. of Chris Hollins).	FRE 402 FRE 802
133	August 27, 2020, Letter from Director of Elections Keith Ingram to Harris County Clerk Chris Hollins about unsolicited ABBMs. (Exhibit 3 – October 6, 2022, Dep. of Sen. Carol Alvarado).	FRE 802
134	Petition, <i>State v. Hollins</i> , NO. 14-20-00627- CV (127th Dist. Ct., Harris County, Tex. Aug. 31, 2020). (Exhibit 7 – May 6, 2022, Dep. of Chris Hollins).	FRE 402 FRE 802
135	August 31, 2020, Letter from Charles K. Eldred to Seth Hopkins about Rule 11 Agreement in <i>State v. Hollins</i> . (Exhibit 8 – May 6, Dep. of Chris Hollins).	FRE 402 FRE 802
136	Opinion, <i>State v. Hollins</i> , 620 S.W.3d 400, 403 (Tex. 2020). (Exhibit 9 – May 6, 2022, Dep. of Chris Hollins).	FRE 402 FRE 802
137	Webpage, Drive-Thru Voting, HARRIS COUNTY ELECTION DIVISION, https://harrisvotes.com/drivethruvoting . (STATE097764-67) (Exhibit 10 - May 6, 2022, Dep. of Chris Hollins).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
138	October 16, 2020, Letter from Attorney General Ken Paxton to Texas Election Officials about drive-thru voting. (Exhibit 7 – October 6, 2022, Dep. of Sen. Carol Alvarado).	FRE 402 FRE 802
139	Petition for Writ of Mandamus, <i>In re Hotze</i> , et al, No. 20-0819, 610 S.W.3d 909 (Tex. 2020). (Exhibit 11 – May 6, 2022, Dep. of Chris Hollins).	FRE 402
140	Justice Devine Dissent, <i>In re Hotze</i> , et al, No. 20-0819, 610 S.W.3d 909 (Tex. 2020). (STATE098278–82).	No Objection
141	Map of 24-Hour Voting Locations in Harris County during November 2020 General Election. (STATE097483).	No Objection
142	Map of Drive Thru Voting Locations in Harris County during November 2020 General Election. (STATE097763).	No Objection
143	September 10, 2020, Email from Elections Division Attorney Charles Pinney to Assistant Director Dan Hayes, Re: Travis County Central Count Accommodations for Poll Watchers. (STATE092408–09).	No Objection
144	Picture taken of sequestered poll watchers in Travis County's central count during November 2020 General Election. (Exhibit 16 – May 11, 2022, Dep. of Bridgette Escobedo).	FRE 402 FRE 802 Foundation
145	Emergency Petition for Writ of Mandamus, <i>In re Mackowiak</i> , et al, No. 20-0889 (Tex. 2020). (STAT098659–724).	No Objection
146	Brief of the Texas Attorney General, <i>In re Mackowiak</i> , et al, No. 20-0889 (Tex. 2020). (STATE097484–90).	FRE 402 FRE 802
147	Rule 11 Agreement between Relators and Respondent, <i>In re Mackowiak</i> , et al, No. 20-0889 (Tex. 2020). (STATE097978–79).	FRE 402 FRE 802

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
148	November 11, 2020, Press Release, Travis County Candidate Settles with Travis County Clerk, Martin Harry for District Attorney. (STATE098419)	FRE 402 FRE 802
149	December 8, 2022, Letter from Harris County Election Administrator Clifford Tatum to Secretary of State John Scott, about Countywide Polling Place Program. (STATE122932–36).	No Objection
150	Harris County November 6, 2018, General and Special Elections Early Voting Schedule. (STATE170226).	No Objection
151	Harris County November 3, 2020, General and Special Elections Early Voting Schedule. (STATE098175–76) (Exhibit 13 – May 6, 2022, Dep. of Chris Hollins).	No Objection
152	Harris County Early Voting Polling Location List for November 3, 2020, General and Special Elections. (STATE098209–213).	No Objection
153	Harris County Election Day Polling Location List for November 3, 2020, General and Special Elections. (STATE098178–208).	No Objection
154	Harris County November 8, 2022, General and Special Elections Early Voting Schedule. (STATE170227–28).	No Objection
155	Turnout and Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/70-92.shtml . (STATE099276–98).	No Objection
156	Bee County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/bee.shtml . (STATE107733).	No Objection
157	Bexar County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/bexar.shtml . (STATE107734–35).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
158	Cameron County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/camer on.shtml . (STATE107736–37).	No Objection
159	Collin County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/collin.shtml . (STATE107738–39).	No Objection
160	Dallas County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/dallas.shtml . (STATE107740–41).	No Objection
161	Denton County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/denton.shtml . (STATE107742–43).	No Objection
162	DeWitt County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/dewitt.shtml . (STATE107744).	No Objection
163	El Paso County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/elpaso.shtml . (STATE107745–46).	No Objection
164	Fort Bend County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/fortbend.shtml . (STATE107747–48).	No Objection
165	Galveston County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/galveston.shtml . (STATE107749).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
166	Guadalupe County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/guadalupe.shtml . (STATE107750-51).	No Objection
167	Harris County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/harris.shtml . (STATE107752-53).	No Objection
168	Hidalgo County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/hidalgo.shtml . (STATE107754-55).	No Objection
169	Medina County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/medina.shtml . (STATE107756).	No Objection
170	Montgomery County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/montgomery.shtml . (STATE107757).	No Objection
171	Starr County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/starr.shtml . (STATE107758-59).	No Objection
172	Tarrant County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/tarrant.shtml . (STATE107760-61).	No Objection
173	Travis County Voter Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/travis.shtml . (STATE107762-63).	No Objection
174	2020-2021 Voting Assistance Guide, Texas (STATE115160-75).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
175	2022-2023 Voting Assistance Guide, Alabama (STATE115060–65).	FRE 402 FRE 802
176	2022-2023 Voting Assistance Guide, Georgia (STATE115074–85).	FRE 402 FRE 802
177	2022-2023 Voting Assistance Guide, Florida (STATE115066–73).	FRE 402 FRE 802
178	2022-2023 Voting Assistance Guide, Hawaii (STATE115086–91).	FRE 402 FRE 802
179	2022-2023 Voting Assistance Guide, Louisiana (STATE115092–99).	FRE 402 FRE 802
180	2022-2023 Voting Assistance Guide, Mississippi (STATE115100–07).	FRE 402 FRE 802
181	2022-2023 Voting Assistance Guide, New Jersey (STATE115108–13).	FRE 402 FRE 802
182	2022-2023 Voting Assistance Guide, New Mexico (STATE115114–19).	FRE 402 FRE 802
183	2022-2023 Voting Assistance Guide, North Carolina (STATE115120–29).	FRE 402 FRE 802
184	2022-2023 Voting Assistance Guide, North Dakota (STATE115130–35).	FRE 402 FRE 802
185	2022-2023 Voting Assistance Guide, Pennsylvania (STATE115136–43).	FRE 402 FRE 802
186	2022-2023 Voting Assistance Guide, South Dakota (STATE115144–51).	FRE 402 FRE 802
187	2022-2023 Voting Assistance Guide, Tennessee (STATE115152–59).	FRE 402 FRE 802
188	2022-2023 Voting Assistance Guide, Texas (STATE115176–91).	No Objection
189	2022-2023 Voting Assistance Guide, Virginia (STATE115192–203).	FRE 402 FRE 802
190	2022-2023 Voting Assistance Guide, West Virginia (STATE115204–209).	FRE 402 FRE 802
191	Webpage, <i>State Laws Governing Early Voting</i> , NATIONAL CONFERENCE OF STATE LEGISLATURES (Aug. 8, 2019). (Exhibit 1 – May 2, 2022, Dep. of Dana DeBeauvoir).	FRE 402 FRE 802
192	List of Amendment to Senate Bill 1, Texas Legislature Online. (Exhibit 21 – October 6, 2022, Dep. of Sen. Carol Alvarado).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
193	Enrolled version of House Bill 315. An Act Relating to a Statement by the Secretary of State Regarding the Furnishing of Certain Personal Information on an Application for a Ballot to be Voted by Mail, H.B. 315, 88 th Leg., R.S. (2023) (STATE182552–55).	No objection
194	Enrolled version of House Bill 3159. An Act Relating to the Use of an Accessible Absentee Mail System by Certain Voters, H.B. 3159, 88 th Leg., R.S. (2023) (STATE182586–91).	No objection
195	Enrolled version of House Bill 357. An Act Relating to the Requirements to Access the Online Tracker of an Application for a Ballot to be Voted by Mail and to the Date of Runoff Elections, H.B. 357, 88 th Leg., R.S. (2023) (STATE182637–40).	No objection
196	Enrolled version of Senate Bill 1052. An Act Relating to the Compensation of an Election Judge or Clerk, S.B. 1052, 88 th Leg., R.S. (2023) (STATE182661–62).	No objection
197	Enrolled version of Senate Bill 1599. An Act Related to Ballots Voted by Mail, S.B. 1599, 88 th Leg., R.S. (2023) (STATE182732–43).	No objection
198	Enrolled version of Senate Bill 477. An Act Relating to Accommodating Voters with a Disability, S.B. 477, 88 th Leg., R.S. (2023) (STATE182774–78).	No objection
199	Enrolled version of Senate Bill 975. An Act Relating to the Procedures for the Issuance of a Personal Identification Certificate to a Person Whose Driver's License is Surrendered, S.B. 975, 88 th Leg., R.S. (2023) (STATE182805–06).	No objection

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STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
200	Expert Witness Report, Prof. Eitan Hersh, Second Supplement to Report on Identification Number Requirements for Mail Balloting under SB 1. (Served on Feb. 10, 2023).	No Objection
201	Expert Witness Report, Prof. Eitan Hersh, Addendum to Second Supplement to Report on Identification Number Requirements for Mail Balloting under SB 1. (Served on May 8, 2023).	No Objection
202	Election Advisory No. 2022-13, Certain Activities in Vicinity of Polling Places, dated February 14, 2022. (STATE001463–67).	No Objection
203	Election Advisory No. 2022-02, Instructions and Deadlines for Mailing/Emailing Ballots Under the Federal “MOVE Act” for Overseas Voters, dated January 10, 2022. (STATE124074–79).	No Objection
204	Election Advisory No. 2021-14, Re: Impact of Redistricting on Certain Election Deadlines and Procedures, dated November 1, 2021. (STATE001477–82).	No Objection
205	Election Advisory No. 2021-10, Re: NEW LAW: SB 1111 (2021, Regular Session) Address Confirmation Process and Forms, dated August 31, 2021. (STATE098870–72).	No Objection
206	Election Advisory No. 2021-09, Re: 2021 Legislative Summary – 87th Regular Session, dated July 30, 2021. (STATE098864–69).	No Objection
207	Election Advisory No. 2021-08, Re: November 2, 2021, Election Law Calendar – Last Updated: June 2021.(STATE097826–859).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
208	Election Advisory No. 2020-27, Re: Minority Language Requirements, dated September 7, 2020. (STATE097824-25).	No Objection
209	Election Advisory No. 2020-17, Re: November 3, 2020, Election Law Calendar – Updated August 2020. (STATE097791-823).	No Objection
210	Election Advisory No. 2019-09, Re: Minority Language Requirements, dated June 25, 2019. (STATE097788).	No Objection
211	Form 5-6, Roster for Voters Hand-Delivering Carrier Envelope, January 2022. (STATE046603)	No Objection
212	Form 5-16, Application for Emergency Early Voting Ballot due to Death in the Family, January 2022. (STATE138843-44).	No Objection
213	Form 5-18, Application for Emergency Early Voting Ballot Due to Sickness or Physical Disability, January 2022 (STATE138169-70).	No Objection
214	Instructions for Form 5-18, Application for Emergency Early Voting Ballot Due to Sickness or Physical Disability, January 2022 (STATE138054).	No Objection
215	Form 5-19, Application for Emergency Early Voting Ballot Board Due to Sickness or Physical Disability: Instructions for Voter after Marking the Ballot, January 2022 (STATE138171).	No Objection
216	Form 5-16(b), Request for Updated Annual Application for Ballot by Mail, prescribed by the Secretary of State, October 2022. (STATE185506-07).	No Objection
217	Form 6-15, Carrier Envelope for Early Voting Ballot, May 2022. (STATE123087-89).	No Objection
218	Instructions for Form 6-15, Carrier Envelope for Early Voting Ballot, May 2022. (STATE123085).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
219	September 27, 2022, Email from Director of Elections Keith Ingram to Joyce LeBombard, League of Women Voters, Re: Two More Quick Questions. (STATE140777-79).	FRE 802
220	December 9, 2021, Email from Deputy Director J. Scott Wiedmann, Federal Voting Assistance Program, to Legal Director Christina Adkins, Re: RE: [Non-DoD Source] Questions on Carrier Envelopes for FPCA voters. (STATE031889-90).	FRE 402 FRE 802
221	February 1, 2022, Email from Elections Division Attorney Melanie Best and Christina Obermiller, Department of Defense, Federal Voting Assistance Program, Re: FPCA ID Question – FVAP/Obermiller. (STATE04893-94).	Incorrect Bates Number; all objections reserved
222	April 19, 2022, Mass Email from Elections Division Attorney Heidi Martinez to Election Officials, Re: Forms Release 4/19/2022. (STATE123303).	No Objection
223	July 7, 2022, Mass Email from Director of Elections Keith Ingram to Election Officials, Re: Notice of Court Order and Revised Election Forms (123318-19).	No Objection
224	August 25, 2022, Mass Email from Secretary of State's Elections Internet account to Election Officials, Re: Important Information for the November 8, 2022, General Election. (STATE124342-44).	No Objection
225	September 21, 2022, Mass Email from Secretary of State's Elections Internet account to Election Officials, Re: Updated Forms and Resources – Notice of Court Order and Revised Election Forms. (STATE138776-78)	No Objection
226	October 11, 2022, Mass Email from Legal Director Christina Adkins to Election Officials, Re: Reminder – Webinar Today. (STATE124636-39).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
227	Request for Proposal, Voter Education and Outreach Opportunities for 2022 Elections, Secretary of State. (STATE137757-837).	FRE 402 FRE 802
228	Report to the 88th Legislature on the Implementation of Educational Programs to Help Voters with Disabilities Understand How to Use Voting Systems Used in the State of Texas. (STATE137752-56).	FRE 402 FRE 802
229	September 8, 2022, Press Release, SOS 101: Voter Registration in Texas, Texas Secretary of State Press Office. (STATE120522-25).	FRE 402 FRE 802
230	October 12, 2022, Press Release, SOS 101: Voting by Mail in Texas, Texas Secretary of State Press Office. (STATE119692-98).	FRE 402 FRE 802
231	September 20, 2022, Press Release, Secretary Scott Marks National Voter Registration Day, Highlights Statewide 'VoteReady' Voter Education Campaign, Texas Secretary of State Press Office. (STATE120634-41).	FRE 402 FRE 802
232	November 7, 2022, Press Release, What to Expect on Election Day in Texas, Texas Secretary of State Press Office. (STATE122811-15).	FRE 402 FRE 802
233	February 9, 2022, Email from Assistant Secretary of State for Communications Sam Taylor to Director of Elections Keith Ingram, Re: Correction to CNN story – incorrect information about new vote by mail ID requirement. (STATE046882-84).	FRE 402 FRE 802
234	Webpage, Voters with Special Needs, EPCOUNTYVOTES.COM, https://epcountyvotes.com/voter_information/voters_with_special_needs . (STATE170217-19).	FRE 402 FRE 802
235	Notice to Voters with Disabilities, Harris County (STATE170319).	FRE 402 FRE 802

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
236	Webpage, Services Available to Voters with Disabilities in Texas, VOTETEXAS.GOV, https://www.votetexas.gov/voters-with-special-needs/ (STATE099301–04).	FRE 402 FRE 802
237	Webpage, FPCA Ballot Tracker, TEXAS SECRETARY OF STATE, https://web-services.sos.state.tx.us/FPCA/index.aspx . (STATE170224–25).	FRE 402
238	Handbook for Election Judges and Clerks, Qualifying Voters on Election Day 2022, Secretary of State, revised January 2022. (STATE034699–779).	No Objection
239	Poll Watcher's Guide, Secretary of State, revised January 2022. (STATE106313–37).	No Objection
240	Travis County Poll Worker Training Manual (064.134855).	No Objection
241	Harris County Election Manual 2022–2023. (STATE170320–527).	No Objection
242	Frequently Asked Questions: Voting in Person (TATUM 005680).	No Objection
243	Power Point Presentation, Poll Watchers, County Election Officials Election Law Seminar, July 2018 (STATE085635–41).	No Objection
244	Power Point Presentation, Communicating Legislative Changes: ID Requirements for Voting by Mail, NASED Presentation, Secretary of State, February 2023. (STATE177246–68).	No Objection
245	Power Point Presentation, <i>SOS Updates 2021</i> , Secretary of State. (STATE075498–527).	No Objection
246	Power Point Presentation, Elections 101, Secretary of State, July 2020. (STATE085183–232).	No Objection
247	Power Point Presentation, <i>Early Voting in Person Changes</i> , Secretary of State (RFP14_000071).	No Objection
248	Power Point Presentation, FAQs on Applications for Ballot by Mail (ABBMs), Secretary of State. (STATE061321–24).	No ObjectionIn

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
249	Power Point Presentation, Election Reconciliation—Official Totals, Webinar, Secretary of State, March 2022. (STATE019553–72).	No Objection
250	Power Point Presentation, Election Reconciliation Forms, Webinar, Secretary of State, April 2022. (STATE087830–66).	No Objection
251	Power Point Presentation, Election Reconciliation Forms, Webinar, Secretary of State, October 2022. (STATE112370–414).	No Objection
252	Power Point Presentation, Opportunity to Correct Defects on Application for Ballot by Mail and Carrier Envelope, Secretary of State, February 2022. (STATE059522–557).	No Objection
253	Power Point Presentation, Training for EVBB/SVC Members on New Ballot by Mail Procedures, Secretary of State, April 2022 (STATE124844–94).	Misidentified; all objections reserved
254	Power Point Presentation, Update from SOS, Secretary of State, August 2022 (STATE111746–83).	No Objection
255	Power Point Presentation, Training for EVBB/SVC Members on New Ballot by Mail Procedures: General Election for State and County Officers, Secretary of State, October 2022 (STATE124640–65).	No Objection
256	Power Point Presentation, Proactive Communication Strategies for Local Election Officials, Secretary of State, Election Seminar, Secretary of State, November 2022. (STATE148646–70).	No Objection
257	Power Point Presentation, Election Forms, Election Seminar, Secretary of State, December 2022. (STATE114273–351)	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
258	Online Poll Worker Training Program, Secretary of State, January 6, 2016 (STATE081477–98).	No Objection
259	2020 Election Administration and Voting Survey, U.S. Election Assistance Commission. (Exhibit 8 – April 7, 2023, Dep. of Tammy Patrick).	FRE 402
260	2020 EA VS Manual, U.S. Election Assistance Commission. (STATE050649–92).	FRE 402
261	2018 Election Administration and Voting Survey, U.S. Election Assistance Commission. (STATE114809 – 5059).	FRE 402
262	2016 Election Administration and Voting Survey, U.S. Election Assistance Commission. (Exhibit 6 – April 7, 2023, Dep. of Tammy Patrick).	FRE 402
263	2014 EAC Election Administration and Voting Survey Comprehensive Report, U.S. Election Commission. (STATE114498–808).	FRE 402
264	2010 Election Administration and Voting Survey, U.S. Election Assistance Commission. (STATE114377 – 497).	FRE 402
265	Travis County Early Voting Locations for November 3, 2020, General Election (STATE098965).	No Objection
266	Travis County Election Day Vote Centers for November 3, 2020, General Election (STATE098974–76).	No Objection
267	Travis County Early Voting Locations for March 1, 2022, Primary Election (STATE098963).	No Objection
268	Travis County Election Day Vote Centers for March 1, 2022, Primary Election (STATE098966–68).	No Objection
269	Travis County Early Voting Locations for May 7, 2022, Local Elections (STATE098964).	No Objection
270	Travis County Election Day Vote Centers for May 7, 2022, Local Elections (STATE098969–71).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
271	Kerr County Polling Locations for November 8, 2022, General Election. (STATE170292).	No Objection
272	Election Reconciliation Form for November 8, 2022, General Election, Travis County (064.134709).	No Objection
273	Preliminary Election Reconciliation – Unofficial Totals for March 1, 2022, Primary Elections, Harris County (Exhibit 7 – April 20, 2022, Dep. of Isabel Longoria).	No Objection
274	Election Reconciliation Form for March 1, 2022, Democratic Primary Election, Harris County (Exhibit 8 – April 20, 2022, Dep. of Isabel Longoria).	No Objection
275	Election Reconciliation Form for March 1, 2022, Republican Primary Election, Harris County (Exhibit 9 – April 20, 2022, Dep. of Isabel Longoria).	No Objection
276	Election Reconciliation Form for November 8, 2022, General Election, Harris County (Tatum 005330).	No Objection
277	Election Reconciliation Form for November 8, 2022, General Election, Harris County (STATE170229).	No Objection
278	Harris County Community Partnership Presentation. (TATUM_005753).	No Objection
279	Reference Manual & Checklist April 2022, Harris County. (STATE098019– 174).	No Objection
280	Poll Worker Training November 8, 2022, General Election, Hays County (STATE181404–45).	No Objection
281	Webpage, <i>Countywide Vote Centers Information</i> , DALLASCOUNTYVOTES.ORG, https://www.dallascountyvotes.org/countywide-polling-places (STATE097760–62).	FRE 402

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
282	Declaration of Brian Keith Ingram, ECF 43-1, <i>Tex. League of United Latin Am. Citizens v. Abbott</i> , 493 F. Supp. 3d 548, 567 (W.D. Tex. 2020), vacated sub nom. Tex. League of United Latin Am. Citizens v. Hughs, No. 20-50867, 2021 WL 1446828 (5th Cir. Feb. 22, 2021). (STATE098337-40).	FRE 802
283	Reporters Record, Vol. 2 of 3, October 13, 2020, Hearing on Plaintiff's Application for Temporary Injunction and Defendants Plea to the Jurisdiction, <i>Anti-Defamation League Austin, Southwest, and Texoma Regions v. Abbott</i> , Cause No. D-1-GH-20-005550. (STATE098977-275).	FRE 402
284	Appellant's Brief, <i>Abbott v. Anti-Defamation League Austin, Southwest, and Texoma Regions</i> , Appellate Cause No. 03-20-00498- CV, 2020 WL 6586318 (Tex. App.—Austin). (STATE097491-600).	FRE 402
285	Appellant's Reply Brief, <i>Abbott v. Anti-Defamation League Austin, Southwest, and Texoma Regions</i> , Appellate Cause No. 03- 20-00498-CV (Tex. App.—Austin). (STATE097601-40).	FRE 402
286	Order, ECF 63, <i>Hotze v. Hollins</i> , No. 4:20- CV-03709, (S.D. Tex. Nov. 2, 2020), aff'd in part, vacated in part sub nom. <i>Hotze v. Hudspeth</i> , 16 F.4th 1121 (5th Cir. 2021). (Exhibit 12 – May 6, 2022, Dep. of Chris Hollins).	FRE 402
287	<i>John Burnett & Marisa Peñaloza, In Rio Grande Valley, Some Campaign Workers Are Paid To Harvest Votes</i> , NPR (July 7, 2015). (STATE107793-808).	FRE 402 FRE 802
288	<i>Tim Acosta, Judge tosses Kleberg County justice of the peace votes, orders new election</i> , CALLER TIMES (June 26, 2018). (STATE107811-13).	FRE 402 FRE 802

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
289	Tim Acosta, <i>Robstown resident pleads guilty to voter fraud, barred from helping in future elections</i> , CALLER TIMES (June 14, 2018). (STATE107836-37).	FRE 402 FRE 802
290	U.S. Census Bureau's Quick Facts: Harris County, Texas, population estimate July 1, 2021. (Exhibit 46 – October 6, 2022, Dep. of Sen. Carol Alvarado).	No Objection
291	Risk for COVID-19 Infection, Hospitalization, and Death by Race/Ethnicity, CENTER FOR DISEASE CONTROL AND PREVENTION (Apr. 7, 2023), https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html . (STATE170541).	No Objection
292	Report of the Commission on Federal Election Reform, <i>Building Confidence in U.S. Elections</i> , September 2005. (STATE097647-759).	FRE 402 FRE 802
293	Transcript of Texas Senate Committee on State Affairs (Part I), August 9, 2021, Hearing, Re: Senate Bill 1. (STATE154280-302).	No Objection
294	Transcript of Texas Senate Committee on State Affairs (Part I), August 9, 2021, Hearing, Re: Senate Bill 1. (STATE154831-77).	No Objection
295	Transcript of Texas Senate Session (Part I), August 11, 2021, Re: Senate Bill 1. (STATE154831-77).	No Objection
296	Transcript of Texas Senate Session (Part II), August 11, 2021, Re: Senate Bill 1. (STATE156701-837).	No Objection
297	Transcript of Texas House Committee on Constitutional Rights and Remedies (Part I), August 23, 2021, Re: Senate Bill 1. (STATE160198-358).	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
298	Transcript of Texas House Committee on Constitutional Rights and Remedies (Part II), August 23, 2021, Re: Senate Bill 1. (STATE162405-462).	No Objection
299	Transcript of Texas House of Representatives Session (Part I), August 26, 2021, Re: Senate Bill 1. (STATE163200-286).	No Objection
300	Transcript of Texas House of Representatives Session (Part II), August 26, 2021, Re: Senate Bill 1. (STATE165397-451).	No Objection
301	Transcript of Texas House of Representatives Session (Part I), August 27, 2021, Re: Senate Bill 1. (STATE166756-772).	No Objection
302	Transcript of Texas House of Representatives Session (Part II), August 27, 2021, Re: Senate Bill 1. (STATE167151-54).	No Objection
303	Transcript of Texas Senate Session, August 27, 2021, Re: Senate Bill 1. (STATE167176-179).	No Objection
304	Transcript of Texas House of Representatives Session, August 31, 2021, Re: Senate Bill 1. (STATE167201-07).	No Objection
305	Transcript of Texas Senate Session, August 31, 2021, Re: Senate Bill 1. (STATE167300-328).	No Objection
306	CONFIDENTIAL 2022 P22 App Rejections (Includes Voters that Cured Rej).xlsx (064.127324)	Misidentified; all objections reserved
307	Summary Exhibit - ABBM application and ballot numbers-20220325T005810Z-001.zip?ABBM application and ballot numbers\reqexpPM22_full.txt (LUPE 0007719)	No Objection
308	ABBM application and ballot numbers - 20220325T005810Z-001.zip?ABBM application and ballot numbers\reqexpPM22_full.txt (LUPE_0007719)	No Objection

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	OBJECTIONS
309	Summary Exhibit - REDACTED - P322_1_Dallas.xlsx (LUPE 0007734)	No Objection
310	REDACTED - P322_1_Dallas.xlsx (LUPE 0007734)	No Objection
311	Summary Exhibit - a_reqexpPM22_full.txt (LUPE 0024430)	Misidentified; all objections reserved
312	a_reqexpPM22_full.txt (LUPE 0024430)	No Objection
313	Summary Exhibit - P322_Election.xlsx (HJ 0008945)	No Objection
314	P322_Election.xlsx (HJ 0008945)	No Objection
315	January 31, 2017, Letter on Results of Audit of November 8, 2016, General Election from Gretchen Nagy, Director, Travis County Voter Registration to Michael Winn, Director, Travis County Clerk Elections Division (383.001691)	FRE 402 FRE 802

DATED: August 15, 2023.

Respectfully submitted,

/s/ Wendy J. Olson

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on August 15, 2023, and that all counsel of record were served by CM/ECF.

/s/ Wendy J. Olson